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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
SCREWS & MORE, LLC.,

Plaintiff,

-against-

PECORA CORP., KENSEAL
CONSTRUCTION PRODUCTS CORP., &
GARVIN BROWN CONSTRUCTION
PRODUCTS, LLC,

Defendants.
-----X

Civil Action No. 07 CV 3637
(KMK) (GAY)
ECF CASE

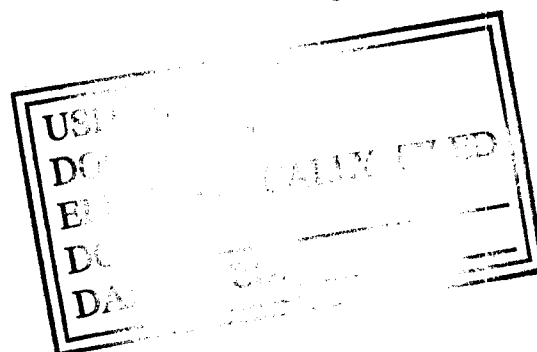
NOTICE OF MOTION
FOR ADMISSION
PRO HAC VICE

FILED
U.S. DISTRICT COURT
S.D. OF N.Y. W.P.
2007 DEC 28 P 1:59

PLEASE TAKE NOTICE that on a date and time to be determined by the Court, at the United States Courthouse for the Southern District of New York, 300 Quarropas Street, White Plains, New York 10601, Defendant, Pecora Corporation (pled as "Pecora Corp."), by and through its attorneys, to wit, Michael J. Kozoriz, Esq., of White and Williams LLP and a member in good standing of the bar of this Court, will move to admit Michelle D. Coburn, Esq., also of White and Williams LLP, 1800 One Liberty Place, Philadelphia, Pennsylvania 19103, tel. 215.864.6355, fax 215.789.7516, *pro hac vice* pursuant to Local Civil Rule 1.3(c).

PLEASE TAKE FURTHER NOTICE that Michelle D. Coburn, Esq., is a member in good standing of the bars of the Commonwealth of Pennsylvania and the State of New Jersey.

PLEASE TAKE FURTHER NOTICE that there are no pending disciplinary proceedings against Michelle D. Coburn, Esq., in any State or Federal court.

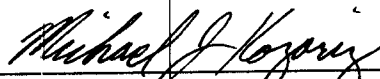


The motion to admit *pro hac vice* will be based on this Notice of Motion, Certification of Michael J. Kozoriz, Esq., and certificate(s) of good standing issued by each state in which Michelle D. Coburn, Esq., is a member of the bar.

A proposed form of Order is attached.

Dated: December 27, 2007

Respectfully submitted,
WHITE AND WILLIAMS LLP
Attorneys for Defendant, Pecora Corp.

By: 
MICHAEL J. KOZORIZ (MK-1929)
One Penn Plaza, Suite 1801
New York, New York 10119
(212) 244-9500 tel.
(212) 631-4432 fax

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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SCREWS & MORE, LLC.,

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**CERTIFICATION OF
MICHAEL J. KOZORIZ
IN SUPPORT OF MOTION TO
ADMIT COUNSEL *PRO HAC VICE***

MICHAEL J. KOZORIZ, an attorney- and counselor-at-law of the State of New York and a member of the bar of the United States District Court for the Southern District of New York, hereby certifies as follows:

1. I am associated with the law firm of White and Williams LLP, attorneys for the Defendant, Pecora Corporation (pled as "Pecora Corp."), in the above-captioned action. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of Pecora Corporation's motion to admit Michelle D. Coburn, Esq., as counsel *pro hac vice* to represent Defendant, Pecora Corporation, in this matter.

2. I am a member in good standing of the bar of the State of New York, and was admitted to practice law in January 2000. I am also admitted to the bar of the United States District Court for the Southern District of New York, and I am in good standing with this Court.

3. I have been an associate in the firm of White and Williams LLP since April 1, 2003. Michelle D. Coburn, Esq., is a partner in the firm of White and Williams LLP, and has been a partner in the firm since 2005.

4. Michelle D. Coburn, Esq., is a partner in the Philadelphia, Pennsylvania office of White and Williams LLP, located at 1800 One Liberty Place, Philadelphia, Pennsylvania 19103.

5. I have found Ms. Coburn to be a skilled attorney and a person of integrity. She is experienced in Federal practice and is familiar with the Federal Rules of Procedure. Ms. Coburn regularly assists Pecora Corporation's national litigation counsel, I. Steven Levy, Esq., previously admitted *pro hac vice* to this Court. Mr. Levy has represented Pecora Corporation in State and Federal courts around the country, and both Mr. Levy and Pecora Corporation wish Ms. Coburn to assist in the defense of Pecora Corporation in this civil action.

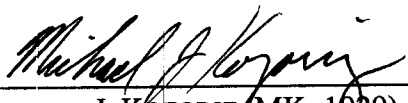
6. Accordingly, I am pleased to move the admission of Michelle D. Coburn, Esq., *pro hac vice*.

7. I respectfully submit a proposed order granting the admission of Michelle D. Coburn, Esq., *pro hac vice*, which is attached hereto as Exhibit A. Attached hereto as Exhibit B are certificates of good standing issued within the last thirty (30) days by the Supreme Court of the Commonwealth of Pennsylvania and the Supreme Court of the State of New Jersey, with respect to Michelle D. Coburn, Esq.

WHEREFORE, it is respectfully requested that the motion to admit Michelle D. Coburn, Esq., *pro hac vice*, to represent Defendant, Pecora Corporation, in the above-captioned matter, be granted.

I certify under penalty of perjury that the foregoing is true and correct.

Dated: December 27, 2007



MICHAEL J. KOZORIZ (MK-1929)

EXHIBIT A

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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SCREWS & MORE, LLC.,

Plaintiff,

-against-

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**ORDER FOR ADMISSION *PRO*
HAC VICE ON WRITTEN MOTION**

THIS MATTER having been opened to the Court upon the application of Michael J. Kozoriz, Esq., of White and Williams LLP, attorneys for Defendant, Pecora Corporation (pled as "Pecora Corp."), for an Order admitting Michelle D. Coburn, Esq., *pro hac vice* pursuant to Local Civil Rule 1.3(c), and the Court having read and considered the papers submitted by counsel, and good cause having been shown;

It is on this _____ day of _____, 20____,

ORDERED that Michelle D. Coburn, Esq., of the law firm of White and Williams LLP, 1800 One Liberty Place, Philadelphia, Pennsylvania 19103, tel. 215.864.6355, fax 215.789.7516, coburnm@whiteandwilliams.com, is hereby admitted to practice *pro hac vice* as counsel for Defendant, Pecora Corporation, in the above-captioned case in the United States District Court for the Southern District of New York. All attorneys appearing before this Court are subject to the Local Rules of this Court, including the Rules governing discipline of attorneys. If this action is assigned to the Electronic Case Filing (ECF) system, counsel shall immediately apply

for an ECF password at nysd.uscourts.gov. Counsel shall forward the *pro hac vice* fee to the Clerk of Court.

Dated:
White Plains, New York

HON.

EXHIBIT B

Supreme Court of New Jersey

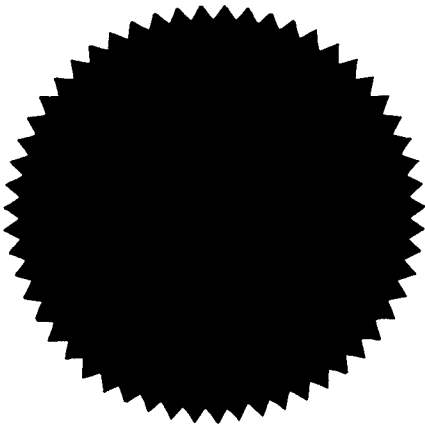


Certificate of Good Standing

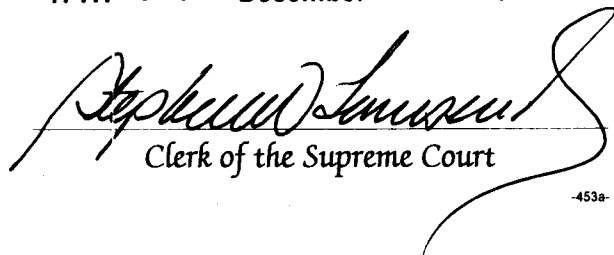
This is to certify that **MICHELLE D COBURN**
(No. **018671991**) was constituted and appointed an Attorney at Law of New
Jersey on **December 19, 1991** and, as such,
has been admitted to practice before the Supreme Court and all other courts of this State
as an Attorney at Law, according to its laws, rules, and customs.

I further certify that as of this date, the above-named is an Attorney at Law in
Good Standing. For the purpose of this Certificate, an attorney is in "Good Standing"
if the Court's records reflect that the attorney: 1) is current with all assessments
imposed as a part of the filing of the annual Attorney Registration Statement, including,
but not limited to, all obligations to the New Jersey Lawyers' Fund for Client
Protection; 2) is not suspended or disbarred from the practice of law; 3) has not
resigned from the Bar of this State; and 4) has not been transferred to Disability
Inactive status pursuant to Rule 1:20-12.

*Please note that this Certificate does not constitute confirmation of an attorney's
satisfaction of the administrative requirements of Rule 1:21-1(a) for eligibility to
practice law in this State.*



In testimony whereof, I have
herein set my hand and
affixed the Seal of the
Supreme Court, at Trenton, this
17TH day of December, 20 07


Clerk of the Supreme Court



Supreme Court of Pennsylvania

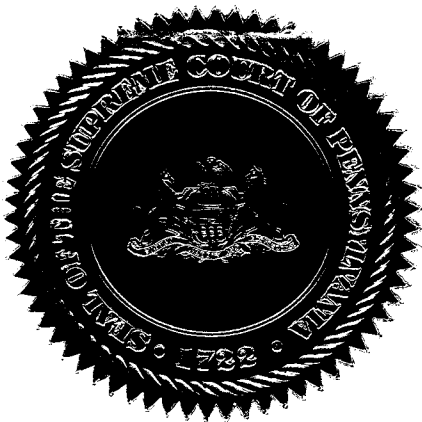
CERTIFICATE OF GOOD STANDING

Michelle D. Coburn, Esq.

DATE OF ADMISSION

December 3, 1991

The above named attorney was duly admitted to the bar of the Commonwealth of Pennsylvania, and is now a qualified member in good standing.



Witness my hand and official seal

Dated: November 29, 2007

A handwritten signature in black ink, reading "Patricia A. Johnson".

Patricia A. Johnson
Chief Clerk

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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CERTIFICATE OF SERVICE

I, MICHAEL J. KOZORIZ, ESQ., a member of the bar of the State of New York and of the United States District Court for the Southern District of New York, hereby certify that on the date indicated below, I caused to be served, by First Class U.S. Mail, copies of the Motion for Admission of Michelle D. Coburn, Esq., *pro hac vice*, in the above-captioned civil action, to all counsel of record, to wit:

Galgano & Associates, P.C.
399 Knollwood Road
White Plains, New York 10603
Attorneys for Plaintiff

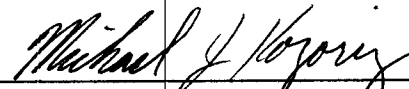
Marcus, Brody, Ford, Kessler & Sahner, LLC
5 Becker Farm Road, Suite 2
Roseland, New Jersey 07068
*Attorneys for Defendant,
Kenseal Construction Products Corp.*

LeClair Ryan, P.C.
Two International Place, 16th Floor
Boston, Massachusetts 02110
*Attorneys for Defendant,
Garvin Brown Construction Products, LLC*

said addresses being the last known addresses by said parties for that purpose.

Dated: December 27, 2007

Respectfully submitted,
WHITE AND WILLIAMS LLP
Attorneys for Defendant, Pecora Corp.

By: 
MICHAEL J. KOZORIZ (MK-1969)
One Penn Plaza, Suite 1801
New York, New York 10119
(212) 244-9500 tel.
(212) 631-4432 fax